

## REMARKS

Claims remaining in the present Patent Application are Claims 1-14. The Applicants respectfully request reconsideration of the above captioned patent application in view of the remarks presented herein.

### 35 U.S.C. § 103(a) Rejections

Claims 1-3 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over admitted prior art (“APA”) and further in view of Reczek et al. (US 4,798,974, “Reczek”). Applicants have carefully reviewed the cited references and assert that embodiments of the present invention as recited in Claims 1-3 are not rendered obvious by APA in view of Reczek.

Applicants respectfully assert that the rejection applies impermissible hindsight in the rejection of Claims 1-3. The rejection assembles a bag of components that allegedly teach various elements of Claim 1. The rejection then makes the statement, “[a]ll that is needed for the combination is the insertion of said switch between the bias supply line, output terminal and ground, which is straightforward in the art.” Herein, the rejection alleges to create an embodiment of the present invention from the cited art when no such suggestion or teachings exist therein. Applicants respectfully assert that a mere collection of parts, even if known in the art, does not teach a particular functional combination absent teachings or suggestions as to how and why to combine the parts in the

particular configuration. Applicants respectfully assert that there is no teaching or suggestion in the cited art to combine the cited elements in the manner recited by Claim 1.

For this reason, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

In addition with respect to Claim 1, Applicants respectfully assert that APA in view of Reczek does not teach or suggest the limitations of “a first control input coupled to a first N-well bias supply line (and) a second control input coupled to a substrate bias supply line” as recited by Claim 1. Applicants respectfully assert that the rejection improperly equates the bias supply lines taught by APA with the recited “control inputs (to a switch).” Applicants respectfully assert that there is no teaching of utilizing the taught bias supply lines as the recited “control inputs (to a switch).” Furthermore, APA does not teach a switch for such alleged “control inputs” to control. Reczek does not correct this deficiency of APA.

For these additional reasons, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Further with respect to Claim 1, Applicants respectfully assert that APA in view of Reczek does not teach or suggest the limitations of “a switched

terminal coupled to a ground" as recited by Claim 1. The rejection asserts that the recited "switched terminal coupled to a ground" is taught by Reczek's FET T4. Applicants respectfully assert that one of ordinary skill in the art would understand a fundamental difference between a switch as taught by T4 and the recited "switched terminal."

For this further reason, Applicants respectfully assert that Claim 1 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Claims 2-8 depend from independent Claim 1. Applicants respectfully assert that these claims overcome the rejections of record as they depend from and allowable base Claim, and respectfully solicit allowance of these Claims.

In addition with respect to Claim 2, Applicants respectfully assert that APA in view of Reczek does not teach or suggest the limitation of "wherein said switch is operable to electrically couple said P-type substrate to said ground when a bias voltage is present on said first N-well bias supply line" as recited by Claim 2. Applicants respectfully assert that the portion of Reczek (column 3 lines 52-54) cited in the rejection refers to a fixed coupling of "supply voltage Vdd" to a well. Applicants respectfully assert that one of ordinary skill in the art would understand a fundamental difference between the taught fixed coupling of "supply voltage Vdd" and the recited selective coupling as claimed.

For this additional reason, Applicants respectfully assert that Claim 2 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

With respect to Claim 3, the rejection mischaracterizes the function of Reczek switch T4 as, “Vdd is the very supply voltage that is switched on, for which operation the electronic switch T4 is inserted.” Applicants respectfully assert that switch T4 does not switch Vdd. Rather, T4 switches “output 17 of the substrate bias voltage generator (which generates a negative voltage substrate bias)... to a circuit point which carries ground potential Vss” (column 3 line 55 – column 4 lines 33) and Figure 2. Applicants respectfully assert that switch T4 cannot possibly switch Vdd as alleged by the rejection as neither terminal of switch T4 is coupled to Vdd.

It is unclear to Applicants how the alleged teaching of T4 is supposed to teach a limitation of Claim 3. However, since the alleged teaching of T4 is demonstrably incorrect, Applicants respectfully assert that such alleged teaching does not teach or suggest a limitation of Claim 3. For this additional reason, Applicants respectfully assert that Claim 3 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Claims 4-8 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over admitted prior art (“APA”) in view of Reczek et al. (US 4,798,974, “Reczek”) and further in view of Nakazato et al. (US 5,386,135,

“Nakazato”). Applicants have carefully reviewed the cited references and assert that embodiments of the present invention as recited in Claims 1-3 are not rendered obvious by APA in view of Reczek and further in view of Nakazato.

Claims 2-8 depend from independent Claim 1. Applicants respectfully assert that these claims overcome the rejections of record as they depend from an allowable base Claim, and respectfully solicit allowance of these Claims. With respect to Claims 4-8, Applicants respectfully assert that Nakazato does not suggest a combination with APA in view of Reczek that corrects the deficiencies of APA in view of Reczek.

In addition with respect to Claim 4, Applicants respectfully assert that APA in view of Reczek and further in view of Nakazato does not teach or suggest the limitation of “a second control input coupled to a second N-well bias supply line” as recited by Claim 4. Applicants respectfully assert that the rejection improperly equates the bias supply lines taught by Nakazato with the recited “control inputs (to a switch).” Applicants respectfully assert that there is no teaching of utilizing the taught bias supply lines as the recited “second control input (to a switch).” Furthermore, Nakazato does not teach a switch for such alleged “second control input” to control. Applicants respectfully assert that APA and/or Reczek do not correct this deficiency of Nakazato.

For this additional reason, Applicants respectfully assert that Claim 4 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

With respect to Claim 5, Applicants respectfully assert that APA in view of Reczek and further in view of Nakazato does not teach or suggest the limitation of “said switch is operable to electrically couple said P-type substrate to said ground when a bias voltage is present on said second N-well bias supply line” as recited by Claim 5. Applicants do not find a citation in the rejection that allegedly teaches this limitation.

For this additional reason, Applicants respectfully assert that Claim 5 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

With respect to Claim 6, Applicants respectfully assert that APA in view of Reczek and further in view of Nakazato does not teach or suggest the limitation of “wherein said switch is operable to electrically couple said P-type substrate to said substrate bias supply line when a substrate bias voltage is present on said substrate bias supply line” as recited by Claim 6. Applicants do not find a citation in the rejection that allegedly teaches this limitation.

Furthermore, with respect to Claim 6, the rejection mischaracterizes the function of Reczek switch T4 as, “Vdd is the very supply voltage that is switched

on, for which operation the electronic switch T4 is inserted.” Applicants respectfully assert that switch T4 does not switch Vdd. Rather, T4 switches “output 17 of the substrate bias voltage generator (which generates a negative voltage substrate bias)... to a circuit point which carries ground potential Vss” (column 3 line 55 – column 4 lines 33) and Figure 2 Applicants respectfully assert that switch T4 cannot possibly switch Vdd as alleged by the rejection as neither terminal of switch T4 is coupled to Vdd.

It is unclear to Applicants how the alleged teaching of T4 is supposed to teach a limitation of Claim 6. However, since the alleged teaching of T4 is demonstrably incorrect, Applicants respectfully assert that such alleged teaching does not teach or suggest a limitation of Claim 6. For this additional reason, Applicants respectfully assert that Claim 6 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

With respect to Claims 7 and 8, Applicants respectfully assert that the rejection applies impermissible hindsight in the rejection of these Claims. The rejection assembles a bag of components that allegedly teach various elements of these Claims. The rejection then invents a switch not taught by the cited art, and further invents the functions recited for said switch. Applicants respectfully note that there is no citation to the cited art indicating where such function is taught.

For these additional reasons, Applicants respectfully assert that Claims 7 and 8 overcome the rejections of record, and respectfully solicit allowance of these Claims.

Claims 9-14 stand rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over admitted prior art (“APA”) and further in view of Reczek et al. (US 4,798,974, “Reczek”). Applicants have carefully reviewed the cited references and assert that embodiments of the present invention as recited in Claims 9-14 are not rendered obvious by APA in view of Reczek.

Applicants respectfully assert that Claim 9 overcomes the rejections of record for the rationales previously presented with respect to Claim 1, and respectfully solicit allowance of this Claim.

In addition with respect to Claim 9, Applicants respectfully assert that APA in view of Reczek does not teach or suggest the limitation of “a switched terminal coupled to a charge pump enable line” as recited by Claim 9.

Applicants respectfully assert that the rejection improperly equates a capacitor as taught by Reczek with the recited “charge pump.” Applicants respectfully assert that the rejection ignores the plain meaning of the term “capacitor,” and the meaning assigned by the cited art. Applicants respectfully assert that one of ordinary skill in the art would find a substantial and

fundamental difference between the taught capacitor and the recited “charge pump.”

Furthermore, Reczek does not teach any form of control, e.g., the recited “enable line,” for a bias voltage generator. Consequently, neither APA (as admitted in the rejection) nor Reczek, alone or in combination, fairly suggest the recited limitations of Claim 9.

For these additional reasons, Applicants respectfully assert that Claim 9 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

Claims 10-14 depend from independent Claim 9. Applicants respectfully assert that these claims overcome the rejections of record as they depend from and allowable base Claim, and respectfully solicit allowance of these Claims.

Further with respect to Claim 11, Applicants respectfully assert that the cited art does not teach a “charge pump,” or a “charge pump enable line,” or a switch that operates responsive to “said charge pump enable line,” as recited by Claim 11.

For these additional reasons, Applicants respectfully assert that Claim 11 overcomes the rejections of record, and respectfully solicit allowance of this Claim.

## CONCLUSION

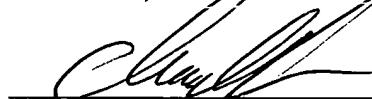
Claims remaining in the present patent application are Claims 1-14. The Applicants respectfully request reconsideration of the above captioned patent application in view of the remarks presented herein.

The Examiner is invited to contact Applicants' undersigned representative if the Examiner believes such action would expedite resolution of the present Application.

Respectfully submitted,

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